

# BakerHostetler

## Baker&Hostetler LLP

45 Rockefeller Plaza  
New York, NY 10111

T 212.589.4200  
F 212.589.4201  
www.bakerlaw.com

Tiffany A. Miao  
direct dial: 212.589.4266  
tmiao@bakerlaw.com

December 22, 2020

### VIA ECF

Hon. Laura Taylor Swain  
United States District Court,  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

## MEMO ENDORSED

*Re: Intrepid Financial Partners, LLC v. Antonio C. Fernandez, Case No.: 1:20-cv-09779*

Dear Judge Swain:

We represent plaintiff Intrepid Financial Partners, LLC in the above-referenced matter. Pursuant to your Honor's Individual Practice Rule A.5, we respectfully submit this letter motion to request permission to file a redacted version of the Parties' Joint Supplemental Pre-Hearing Submission. The information plaintiff seeks to redact in the referenced document is narrowly tailored to sensitive non-public information regarding proprietary client information and trade secrets, pursuant to the Stipulation and Protective Order entered into by the parties, ECF No. 37, para. 1, and consistent with *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006); *see also Encyclopedia Brown Prods., Ltd. v. Home Box Office, Inc.*, 26 F. Supp. 2d 606, 612 (S.D.N.Y. 1998) ("Potential damage from release of trade secrets is a legitimate basis for sealing documents..."). Defendant consents to this application.

Accordingly, plaintiff respectfully requests that the Court grant its application and enter an order allowing the redaction filed.

Hon. Laura Taylor Swain  
December 22, 2020  
Page 2

Sincerely,



Tiffany A. Miao

The foregoing request is granted. DE# 93 resolved.  
SO ORDERED.

12/23/2020

/s/ Laura Taylor Swain, USDJ

cc: Tina Solis, Esq.  
Daniel Schnapp, Esq.  
Christina Kurow, Esq.  
John Siegal, Esq.